

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	CASE NO. 3:22-CR-00340
	)	CHIEF JUDGE CRENSHAW
MAHAN JANBAKHSH a/k/a	)	
MARK JANBAKHSH	)	

**MOTION FOR LEAVE TO FILE MOTION UNDER SEAL**

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorney, and respectfully requests that the court place the *Motion to Disqualify* (the “Motion”) under seal. The Motion discusses matters relating to Mahan Janbakhsh a/k/a Mark Janbakhsh’s attorney-client privilege and another individual’s attorney-client privilege and potential cooperation. As such, the United States requests to seal the Motion and to serve it only upon counsel for Mark Janbakhsh.

Accordingly, the United States respectfully requests that Court grant the motion for leave to file under seal.

Respectfully submitted,

MARK H. WILDASIN  
United States Attorney  
Middle District of Tennessee

/s/ Kathryn W. Booth  
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### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing has been served via the Court's electronic filing system on all counsel of record, this 13th day of December, 2022.

/s/ Kathryn W. Booth  
Kathryn W. Booth